

§
§
§
§
§
§
§
§
§
§
§

SNMP RESEARCH, INC. and SNMP
RESEARCH INTERNATIONAL, INC.,

Plaintiffs,

v.

BROADCOM INC.; BROCADE
COMMUNICATIONS SYSTEMS LLC;
and EXTREME NETWORKS, INC.,

Defendants.

Case No. 3:20-cv-00451

U.S. District Judge Charles E. Atchley, Jr.

Jury Demand

COME NOW Plaintiffs SNMP Research, Inc. and SNMP Research, International, Inc. (collectively, “Plaintiffs”), by and through the undersigned counsel of record, and pursuant to the Scheduling Order entered by this Court (Dkt. 242), and Federal Rule of Civil Procedure 26(a)(3)(A)(i), hereby submit the following supplemental witness list. Plaintiffs reserve the right to call rebuttal witnesses as deemed necessary at the time of trial.

	<u>Name</u>	<u>Address</u>	<u>Phone Number</u>	<u>Will/May Call</u>
1.	Dr. Jeffrey D. Case	Contact through counsel for Plaintiffs	Contact through counsel for Plaintiffs	Will call live
2.	Steve Blizzard	Contact through counsel for Plaintiffs	Contact through counsel for Plaintiffs	May call live
3.	David Reid	Contact through counsel for Plaintiffs	Contact through counsel for Plaintiffs	May call live

4.	David Spakes	Contact through counsel for Plaintiffs	Contact through counsel for Plaintiffs	May call live
5.	Patti Sams	Contact through counsel for Plaintiffs	Contact through counsel for Plaintiffs	May call live
6.	Daniel DeBacker	Contact through counsel for Extreme	Contact through counsel for Extreme	May call live or by deposition
7.	Michael Fitzgerald	Contact through counsel for Extreme	Contact through counsel for Extreme	Will call live and/or by deposition if witness not available at trial
8.	Hardik Ajmera	Contact through counsel for Extreme	Contact through counsel for Extreme	Will call live and/or by deposition if witness not available at trial
9.	Kaylee Freeman	Contact through counsel for Extreme	Contact through counsel for Extreme	May call live or by deposition
10.	Antony Hutchins	Contact through counsel for Extreme	Contact through counsel for Extreme	May call live or by deposition
11.	Paul Segalini	Contact through counsel for Extreme	Contact through counsel for Extreme	May call live or by deposition
12.	Fiona Nolan	Contact through counsel for Extreme	Contact through counsel for Extreme	May call live or by deposition
13.	Robert Reason	Contact through counsel for Extreme	Contact through counsel for Extreme	May call live or by deposition
14.	David Carson	Contact through counsel for Extreme	Contact through counsel for Extreme	May call live or by deposition
15.	Kevin Frick	Contact through counsel for Extreme	Contact through counsel for Extreme	May call live or by deposition
16.	Tim Bourne	Contact through counsel for Extreme	Contact through counsel for Extreme	May call live or by deposition

17.	Yeeping Zhong	26131 Altadena Dr., Los Altos Hills, CA 94022-2009	408-772-1689	May call live or by deposition
18.	Tara Flanagan	Contact through counsel for Extreme	Contact through counsel for Extreme	May call live or by deposition
19.	Scott Bradner	Contact through counsel for Plaintiffs	Contact through counsel for Plaintiffs	Will call live
20.	Mark Chandler	Contact through counsel for Plaintiffs	Contact through counsel for Plaintiffs	Will call live
21.	Dr. Ravi Dhar	Contact through counsel for Plaintiffs	Contact through counsel for Plaintiffs	Will call live
22.	Steve Waldbusser	Contact through counsel for Plaintiffs	Contact through counsel for Plaintiffs	Will call live
23.	Michael J. Wallace	Contact through counsel for Plaintiffs	Contact through counsel for Plaintiffs	Will call live
24.	Regan Smith	Contact through counsel for Plaintiffs	Contact through counsel for Plaintiffs	Will call live

Plaintiffs further identify as “May call” any witnesses identified by Extreme on its witness list and impeachment witnesses as appropriate.

Plaintiffs also provisionally list Kevin Gray, whom Plaintiffs may call to trial in light of the fact that Extreme has listed Mr. Gray its initial disclosures and on its witness list (Dkt. 397). Plaintiffs will notice the deposition of Mr. Gray. If Extreme does not produce him for deposition, and to the extent Extreme attempts to bring Mr. Gray to trial without permitting Plaintiffs to depose him, then Extreme should not be permitted to bring him as a witness for trial.

In addition, Plaintiffs’ prior witness list (Dkt. 398) identified other provisional witnesses, but Plaintiffs have now removed Indhu Balraj, Tibor Fabry-Asztalos, Manjunath Gowda, Larry Fitterer, Michael Yip, and Peter Lam from this provisional list based on the fact that Extreme did

not list any of these witnesses on its witness list and thus will not be calling these witnesses to trial. Plaintiffs reserve the right to call any one of them (Indhu Balraj, Tibor Fabry-Asztalos, Manjunath Gowda, Larry Fitterer, Michael Yip, and Peter Lam) to trial to the extent Extreme attempts to do so. Moreover, to the extent Extreme does attempt to bring any of these witnesses to trial without stipulating that Plaintiffs may first depose them, then Extreme should not be permitted to call any such witnesses at trial.

Respectfully submitted this 19th day of May, 2024.

By: /s/ John L. Wood
John L. Wood, Esq. (BPR #027642)
Cheryl G. Rice, Esq. (BPR #021145)
Rameen J. Nasrollahi, Esq. (BPR #033458)
EGERTON, McAFEE, ARMISTEAD
& DAVIS, P.C.
900 S. Gay Street, Suite 1400
P.O. Box 2047
Knoxville, TN 37902
(865) 546-0500 (phone)
(865) 525-5293 (facsimile)
jwood@emlaw.com
crice@emlaw.com
rnasrollahi@emlaw.com

Morgan Chu (CA Bar. No. 70446)
David Nimmer (CA Bar. No. 97170)
A. Matthew Ashley (CA Bar. No. 198235)
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067-4276
(310) 277-1010 (phone)
(310) 203-7199 (facsimile)
mchu@irell.com
dnimmer@irell.com
mashley@irell.com

Olivia Weber (CA Bar. No. 319918)
BIENERT KATZMAN LITTRELL WILLIAMS
LLP
903 Call Amanecer, Suite 350
San Clemente, CA 92673
(949) 369-3700 (phone)
(949) 369-3701 (facsimile)
oweber@bklwlaw.com

Attorneys for Plaintiffs
SNMP Research International, Inc.
SNMP Research, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this the May 19, 2024, a true and accurate copy of the foregoing was served on counsel of record for Defendant in this matter electronically.

/s/ Olivia Weber